

## **Meeting summary**

**King County Industrial Waste Program**

**Industrial Waste Advisory Committee**

**([http://www.kingcounty.gov/environment/wastewater/IndustrialWaste/About/Advisory\\_committee.aspx](http://www.kingcounty.gov/environment/wastewater/IndustrialWaste/About/Advisory_committee.aspx))**

February 2, 2011

9 a.m. to noon

**Facilitator:** Despina Strong, King County Industrial Waste Program (KCIW) environmental program managing supervisor

### **Attending:**

#### **IWAC members**

Kevin Burrell, Environmental Coalition of South Seattle (ECOSS)

Wendee Cook, Exotic Metals Forming Co.

Ken Falcone, Cargill, Inc.

Bill Hughes, Bellevue Community College

Mark LaFata, Aerojet-General

Steve Simacek, HYTEK Finishes

Chris VanHoof, City of Kent

Scott Woerman, Landau Associates

#### **KCIW staff**

Arnaud Girard, compliance investigator

Pat Magnuson, lead compliance investigator

Despina Strong, environmental program managing supervisor

Dana West, communications specialist

#### **Guests**

Jillian Marcy, Exotic Metals Forming Co.

Gail Spencer, Todd Pacific

### **Opening remarks: (Despina Strong)**

Adjustments to the meeting format have been made so that meetings can start at 9:30 a.m. with the option of members gathering before the meeting for refreshments and extended networking at 9 a.m.

Welcome to new member Gail Spencer from Todd Pacific!

### **Presentations:**

#### **KCIW Program updates, review and discussion**

##### **Application process improvements - Construction dewatering (Arnaud Girard)**

Arnaud presented information about the King County Construction Dewatering Rule, and construction dewatering pretreatment, permitting considerations and updates to the program's

construction dewatering request form. The application for construction site dewatering is one of several KCIW specialized wastewater discharge approval applications, including those for contaminated stormwater and septage waste.

Highlights from the discussion:

- The increase in requests to discharge construction dewatering has been driven, overall, by changes in Washington State Department of Ecology (Ecology) regulations.
- Another driver, locally, is better communication of discharge requirements.
- An additional driver is that dischargers cannot chemically treat the wastewater to meet state / local discharge limits for direct discharge.
- The current number of approvals KCIW has in its system for construction dewatering is lower than in the recent past. Discharge approvals for construction dewatering are intended to be in effect throughout the life of a given project. Because project timelines tend to shift, program staff stresses clarifying time estimates with the projects as approvals are developed.
- The main concerns in accepting these discharges into the sewer system are, in addition to volume, high pH from concrete work and solids that could clog the sewer lines. In addition, soil and/or groundwater contamination at some sites can result in the presence of additional contaminants of concern. The most prevalent type of contamination reported is gasoline byproducts, often a result of leaking storage or conveyance equipment.
- Although the information that discharge applicants provide the program is generally assumed to be complete and correct, program staff does follow-up as needed with phone conversations, site visits and occasional sampling.
- Facilities that discharge have requirements to keep the program informed, and staff will do further evaluation of sites if indicated.

As the application form revision is completed, KCIW will also address internal procedures in relation to the approval.

Members were encouraged to review the proposed application form and submit any additional comments to Dana within a week.

#### **KCIW definitions and glossary (Pat Magnuson)**

KCIW's proposed changes to King County Code were approved by the Metropolitan King County Council in fall 2010. The changes were necessary due to amendments the U.S. Environmental Protection Agency made to its Pretreatment Streamlining Final Rule that updated the National Pretreatment Program.

Because the code changes created revisions in regulatory language, program staff is reviewing the wastewater discharge approval application, as well as its attachments. Staff found that the definitions provided in a glossary KCIW currently sends with application forms are primarily all present in a section of King County Code. The program's preference is to stop including the glossary document. The few definitions in the current glossary that are not present in County Code are defined in other documents used in the regulatory process or commonly used by industries that discharge industrial wastewater. It is inefficient for the program to track changes to these regulatory definitions and to maintain a separate, mainly redundant document.

IWAC members pointed out that while referring to the definitions was very important to applicants, that need could be satisfied by referring to the definitions in the code. Members were encouraged to consider the matter and return any comments to Dana within a week or so.

### **KCIW Program – (Despina Strong)**

#### **2011 characterization study for the County's NPDES permits**

As presented in November 2010 to this group, the program will conduct a study in 2011 to more fully characterize industrial discharges to meet the requirements of the last round of the County's two largest treatment plants' National Pollutant Discharge Elimination System permits issued by Ecology. The program will collect and analyze for priority pollutants at a number of different types of facilities that discharge to the County's West Point and South treatment plants.

To update the group, Despina mentioned that Ecology has approved the study, which exceeds the agency's requirements. Sampled facilities, which will not have to conduct the sampling, will receive the data collected. KCIW will combine this additional work with regular sampling in a study to be completed in 2011.

In the discussion, Despina clarified that effectiveness is the driver for doing sampling that exceeds the Ecology's requirements; additional sampling leads to an increase of valuable information while being done with an economy of scale. For example, adding PCB sampling to the study increases information about a chemical of concern in the Lower Duwamish Waterway cleanup.

To develop the study, the program considered NPDES requirements and what KCIW monitors for source control purposes. The study may help the County to validate that industrial sources are not major contributors of some of the pollutants of concern in Puget Sound. At this time KCIW is not seeing a specific trend of adding additional pollutant limits to NPDES permits in this region, however, the program is noting requests for studies, such as those concerning nutrient removal.

#### **KCIW fees and monitoring charges and fees evaluation**

Despina updated a fees presentation done at the November 2010 meeting, as KCIW has since completed its annual fees approval process with its managers. The program had proposed 2011 fee increases to recover its costs, with managers approving step increases with maximum amounts allowable, due to economic concerns and the affects on some businesses.

Additionally, the County's Wastewater Treatment Division director has requested that KCIW review its model for calculating its fees so that it can be fair and equitable, with any increases sustainable. This careful review process will take time.

### **Final KCIW EnvirOvation Award criteria and eligibility**

KCIW gives the EnvirOvation Award to companies and facilities with industrial wastewater discharge approvals within the King County sewer service area that are leaders in environmental protection. The award provides an incentive to area facilities to voluntarily go beyond regulatory obligations to manage operations in ways that help support regional efforts to help protect public health and enhance the environment.

As a part of KCIW's continuing commitment to customer service, the program KCIW reviewed and revised the EnvirOvation Award eligibility and criteria in 2010. The program did not accept applications for the EnvirOvation Award during this review period.

In 2010 the program asked for IWAC members' views on the draft revised award eligibility and criteria, with members also commenting on the awards process. Despina thanked the members for their input. The name of the award will remain the same. The program will provide articles to publicize the EnvirOvation award in upcoming newsletters. While eligible facilities are expected to self-nominate, program staff are encouraged to identify facilities that could meet the award criteria.

### **Roundtable (Committee members – all)**

ECOSS will present an Industrial Stormwater Management workshop for industrial and construction compliance managers as part of the Managing Stormwater in the Northwest Conference of the Northwest Environmental Business Council on March 3 in Seattle. Go to: [www.nebc.org](http://www.nebc.org).

Landau Associates has won the 2011 American Council of Engineering Companies of Washington Silver Award as Best in State for an aquifer bioremediation project for The Boeing Co.